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March 15, 2018

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K. Chad Burgess, Esquire  
South Carolina Electric & Gas Company/SCANA  
220 Operation Way - MC C222  
Cayce, SC 29033-3701

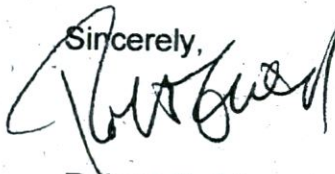
In Re: Friends of the Earth and Sierra Club v. SCE&G,  
Prudence of South Carolina Electric & Gas Company Construction of a  
Nuclear Base Load Generation Facility at Jenkinsville, South Carolina and the  
Unjust and Unreasonable Rates Related Thereto  
Docket No. 2017-207-E

Dear Chad:

Enclosed please find Complainants' Third Interrogatories, Document Production  
Requests and Request for Entry, in the above matter  
Should you have any question regarding this discovery, please do not hesitate to  
call.

With kind regards I am

Sincerely,



Robert Guild  
(803) 917 5738

Encl.s

CC: Ms. Jocelyn D. Boyd  
Chief Clerk & Administrator  
Public Service Commission of South Carolina



BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2017-207-E

In Re: Friends of the Earth and Sierra Club,	)
Complainants/ Petitioners,	)
	)
v.	)
	)
South Carolina Electric & Gas Co.,	)
Defendant / Respondent.	)

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COMPLAINANTS' THIRD INTERROGATORIES, DOCUMENT  
PRODUCTION REQUESTS AND REQUEST FOR ENTRY

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TO: K. CHAD BURGESS, ESQUIRE, ATTORNEY FOR SOUTH CAROLINA  
ELECTRIC & GAS COMPANY, DEFENDANT / RESPONDENT  
(HEREAFTER SCE&G):

Pursuant to R. 103-833 of the Commission's Rules, Rules 33 and 34 of the South Carolina Rules of Civil Procedure and the Commission's Order No. 2017-637, dated October 4, 2017, the Complainants / Petitioners, above-named, propound the following interrogatories and request that Defendant / Respondent, SCE&G produce and permit Complainants / Petitioners to inspect and copy each of the documents described below at the earliest available date within 20 days at the offices of the Defendant / Respondents' counsel, or at such other place as may be mutually agreed upon by counsel.

The Complainants / Petitioners further request that they and their agents be permitted entry at times and dates to be mutually agreed upon by counsel within 20 days

upon the lands and premises which are the location of the subject facility for purposes of inspection, measuring, surveying, photographing, testing, or sampling.

### DEFINITIONS AND INSTRUCTIONS

A. The term "document" means and includes, but is not limited to, letters, memoranda, notes, studies, minutes of meetings, drawings, photographs, plats, deeds, maps, publications, calendar notations, diaries, contracts, receipts, computer E-mails and other computerized records, messages, telephone logs, canceled checks, itineraries, agreements, records, charts, lists, plans, magnetic tape recordings, telecopier messages, or copies of any of the foregoing now in the possession, care, custody (actual or constructive) of the Respondents, or of any of its agents or principals including, attorneys, consultants, employees or representatives.. If any document requested herein was, but no longer is, in your possession or control, state what disposition was made of it, when, and such document's location.

B. The term "communication" means and includes, but is not limited to, any transmission of words or thoughts between or among two or more persons including but not limited to spoken words or thoughts, discussions, conferences, conversations, negotiations, agreements, understandings, inquiries, promises, complaints, correspondence whether transmitted in person or by any electronic, telephonic or other means.

C. The term "person" means and includes, but is not limited to, natural persons, corporations, partnerships, associations, joint ventures, trusts, governments, and all other forms of legal entities, and the officers, directors, employees, agents, attorneys, partners

and personal representatives thereof.

D. The term "relating to" means or refers to consisting of, constituting, containing, referring to, relating to, evidencing, reflecting or being in any way logically or factually connected with the matter discussed.

#### DOCUMENTS TO BE PRODUCED

1. All documents relating to the monthly "Project Review Meeting Minutes - V.C. Summer Units 2 and 3," or similarly entitled meetings, since the nuclear project's inception; including but not limited to all slides and presentation materials referred to or reviewed at such meetings, all work papers and materials used in preparing for such meetings, all documents reflecting attendance and participation in such meetings, and all documents reflecting actions taken and resolution of issues identified at such meetings.
2. All documents relating to "High Bridge Reviews" or "High Bridge Reports" on the nuclear project management, including all work papers and materials used in preparing for such reviews, and all documents reflecting actions taken and resolution of issues identified in such reviews including documents reflecting the role of "WECTEC" in the project.
3. All documents relating to so-called "Prism reports" regarding the nuclear project, including, but not limited to the "V.C. Summer Cost Performance Report - March 2017;" including all work papers and materials used in preparing such reports, and all documents reflecting actions taken and resolution of issues identified in such reports.

4. All documents relating to the "VC Summer Project Risk Management Risk Mitigation Plans, 1/20/2016," and prior and subsequent versions of such plans, including documents relating to the items numbered 1 through 30C listed in the Table of Contents, page 2, of that specific document; including all work papers and materials used in preparing such plans, and all documents reflecting actions taken and resolution of issues identified in such plans.

5. All documents relating to "CAR 2014-1961 Root Cause Report, December 16, 2014," including any prior and subsequent versions of such report and all work papers and materials used in preparing such reports, and all documents reflecting actions taken and resolution of issues identified in such reports.

6. All documents relating to so-called "Tiger Team" reports on nuclear project design changes and other issues, for December 2016,; including any prior and subsequent versions of such reports and all work papers and materials used in preparing such reports, and all documents reflecting actions taken and resolution of issues identified in such reports.

7. All documents relating to written, oral or electronic communication by or among the following persons concerning financial issues regarding the nuclear project, including accounting, budgeting, owners' and contractors' cost projections and forecasts: Kevin Marsh, Steve Byrne, Jimmy Addison, Carlette Walker and Abney (Skip) Smith.

8. All documents relating to reports to the US Nuclear Regulatory Commission of potential significant deficiencies or nonconformances in design, engineering,

procurement, materials management and construction of the nuclear project, and reports of potential breakdowns in the Quality Assurance Program required by 10 CFR Part 50, Appendix B for the project, including all root cause evaluations and corrective action plans; all assessments of potential project cost and schedule impacts of such deficiencies, nonconformances, breakdowns and corrective action plans, including all work papers and materials used in preparing such reports, evaluations, plans and assessments.

9. All documents relating to "Projected Revenue Rate Increases" associated with the nuclear project, including the projection presented in the "Revenue Update, November 2016," all prior and subsequent projections; including all work papers and materials used in preparing such projections.

10. All documents relating to abandoned nuclear project cost recovery proposals, including all alternative proposals considered with regard to the proposed recovery period, the amount of proposed project costs to be recovered, the rate of return on equity proposed to be recovered, among any other varied proposals considered for rate treatment and project cost recovery; including all work papers and materials used in preparing such proposals

11. All documents relating to employment of and representation by outside construction litigation counsel, including but not limited to the firm of Smith, Currie and Hancock, regarding potential claims against Toshiba Corporation, Westinghouse Electric Company and others in the EPC Consortium or other parties regarding the nuclear project, including the employment and work of the Bechtel Power Corporation

or other consultants; including documents reflecting decisions to revise, amend, delete and withhold from public disclosure or disclosure to regulatory authorities, information regarding the nuclear project derived through such employment, including all work papers and materials used in preparing such documents.

12. All documents provided in discovery or data requests to any other party including the Office of Regulatory Staff in this proceeding or in Docket Nos. 2017-305-E and 2017-370-E.

### INTERROGATORIES

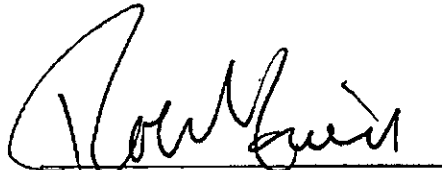
1. Give the names and addresses of persons known to Respondent or its counsel to be witnesses concerning the facts of the case and indicate whether or not any written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

2. Set forth a list of photographs, plats, sketches or other prepared documents in possession of Respondent or its counsel that relate to the claim or defense in the case.

3. List the names and address of any expert witness whom Respondent proposes to use as a witness at the trial of the case.

4. For each person known to Respondent to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known or observed by such witness, or provide a copy of any written or recorded statements taken from such witness.

March 15, 2018



Robert Guild  
314 Pall Mall  
Columbia, SC 29201  
(803) 917-5738

ATTORNEY FOR COMPLAINANTS / PETITIONERS  
FRIENDS OF THE EARTH AND SIERRA CLUB